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8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION**

10  
11 N.Z., R.M., B.L., S.M., and A.L.,  
12 individually and on behalf of  
13 themselves and all others similarly  
situated,

14 Plaintiffs,

15 vs.

16 FENIX INTERNATIONAL LIMITED,  
17 FENIX INTERNET LLC, BOSS  
BADDIES LLC, MOXY  
18 MANAGEMENT, UNRULY  
AGENCY LLC (also d/b/a DYSRPT  
19 AGENCY), BEHAVE AGENCY LLC,  
A.S.H. AGENCY, CONTENT X, INC.,  
20 VERGE AGENCY, INC., AND ELITE  
CREATORS LLC,

21 Defendants.

CASE NO. 8:24-cv-01655-FWS-SSC

**MOXY MANAGEMENT'S  
STATEMENT OF NON-  
OPPOSITION TO DEFENDANTS  
FENIX INTERNATIONAL  
LIMITED'S AND FENIX  
INTERNET LLC'S MOTION TO  
DISMISS FOR FORUM NON  
CONVENIENS**

Date: January 30, 2025

Time: 10:00 a.m.

Crtrm.: 10D

Assigned to Hon. Fred W. Slaughter

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE THAT** Defendant Moxy Management (“Moxy”) does not oppose Defendants Fenix International Limited’s and Fenix Internet LLC’s (the “Fenix Defendants”) Motion to Dismiss for Forum Non Conveniens (Dkt. 60), and contends it should be granted for the reasons set forth therein.

DATED: November 27, 2024

Respectfully submitted,

Oliver Rocos  
Barr Benjamin  
Bird, Marella, Rhow,  
Lincenberg, Drooks & Nessim, LLP

By: 

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Oliver Rocos  
Attorneys for Defendant Moxy  
Management